

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO on the)	
relation of State Engineer,)	
)	
Plaintiff,)	
)	69cv07941-BB-ACE
-v-)	
)	RIO CHAMA STREAM SYSTEM
RAMON ARAGON et al.,)	
)	Sections 3 & 7
Defendants.)	
)	

MOTION TO EXTEND DEADLINE TO COMPLETE
HISTORICAL REPORT FOR SECTION 7

COMES NOW the Asociación de Acéquias Norteñas de Rio Arriba (the Acequias) and moves to extend the deadline set in the Order Amending Priorities Adjudication Schedule, entered December 27, 2006 (Docket No. 8523), and in support thereof states the following:

The Acequias completed and submitted to the State a copy of the historical report for the Chama subsection on October 31, 2008. However, the Acequias need additional time to complete a report for the remaining four subsections in Section 7. The Acequias believe that they can complete and submit a report covering all four subsections by January 14, 2010.

The State does not oppose this motion, on the condition that no additional extensions of time will be requested or granted.

WHEREFORE, the Acequias request that the Court enter an order granting an extension of time for the Acequias to submit a report for the four remaining subsections of Section 7 by no later than January 14, 2010.

Respectfully Submitted,

SHEEHAN, SHEEHAN & STELZNER, P.A.
Attorneys for Acéquias Norteñas
40 First Plaza N.W., Suite 740 (87102)
Post Office Box 271
Albuquerque, New Mexico 87103
(505) 247-0411

Electronically Filed

BY: /s/ John W. Utton
JOHN W. UTTON

Approved on October 20, 2009

EDWARD E. NEWVILLE
Attorney for the State
Post Office Box 25102
Santa Fe, New Mexico 87504-5102
(505) 827-6150

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of October, 2009, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

• Shenan Rae Atcity shenan.atcity@hklaw.com	• Bradley S. Bridgewater bradley.s.bridgewater@usdoj.gov,wade.gibson@usdoj.gov,khaleelah.jones@usdoj.gov,katherine.t.ribbett@usdoj.gov,yvonne.marsh@usdoj.gov
• Kimberly Bannerman kbannerman@newmexicowaterlaw.com	• James C. Brockmann jcbrockmann@newmexicowaterlaw.com
• David A. Benavides davidb@nmlegalaid.org	• Christina J. Bruff cjb@lrpa-usa.com
• Leander Bergen lbergen@nativeamericanlawyers.com,bmeyerson@nativeamericanlawyers.com	• Charlie Chacon tedjtrujillo@yahoo.com
• Frank M Bond fbond@simonsfirm.com,ggonzales@simonsfirm.com,sgarcia@simonsfirm.com,fbond@mac.com	• Chama Investments, Inc. aaa@aaa.com

- **Tessa T. Davidson**
ttd@tessadavidson.com
- **Rebecca A. Dempsey**
rdempsey@cuddymccarthy.com,fmtz@cuddymccarthy.com
- **Dos Rios Development, LLC**
aaaa@aaa.com
- **Dos Rios Development, LLC**
aaaa@aaa.com
- **Dos Rios Ranch, LLC**
rmlaw202@aol.com
- **Charles T. DuMars**
ctd@lrpa-usa.com
- **Brian F. Egolf, Jr.**
brian@egolflaw.com,brian@briangolf.com
- **Estate of Julian Serrano, Deceased**
egolfb@yahoo.com
- **Randolph B. Felker**
randfelker@aol.com,RBF@felkerishlaw.com
- **Jeffrey Fornaciari**
jfornaciari@hinklelawfirm.com,aschnuck@hinklelawfirm.com
- **Gary S. Friedman**
gsf@chflaw.com
- **Vickie L. Gabin**
vlgabin@nm.net
- **David W Gehlert**
david.gehlert@usdoj.gov,efile_nrs.enrd@usdoj.gov,jennifer.vaughn2@usdoj.gov
- **Ryan Margaret Golten**
ryang@nmlegalaid.org
- **Karla JaNelle Haught**
janelle.haught@state.nm.us,trish.gallegos@state.nm.us
- **James A Heath**
rmlaw202@aol.com
- **Mary E. Humphrey**
humphrey@newmex.com
- **John F. McCarthy , Jr**
jmccarthy@cuddymccarthy.com
- **David C Mielke**
dmielke@abqsonosky.com,sdressler@abqsonosky.com
- **Edward G. Newville**
ednewville@rgunwired.net,connie.flint@state.nm.us,marjorie.dryden@state.nm.us,fred.kipnes@state.nm.us,gabriel.wade@state.nm.us
- **Brett J Olsen**
brett_olsen@msn.com
- **Roberta Orona-Cordova**
pwhite9098@aol.com
- **Marcus J Rael , Jr**
marcus@roblesrael.com,laura@roblesrael.com,kristina@roblesrael.com,anita@roblesrael.com,nicole@roblesrael.com,diane@roblesrael.com
- **Walter L. Reardon , Jr**
walter@reardonlawnm.com
- **Gregory C. Ridgley**
greg.ridgley@state.nm.us,marjorie.dryden@state.nm.us,vina.gallegos@state.nm.us
- **Tanya L. Scott**
tls@lrpa-usa.com
- **Peter B. Shoenfeld**
petershoenfeld@qwestoffice.net

• **Arianne Singer**

arianne.singer@state.nm.us,connie.flint@state.nm.us,marjorie.dryden@state.nm.us,fred.kipnes@state.nm.us,vina.gallegos@state.nm.us,bushnell@law.unm.edu,Rozella.bransford@state.nm.us

• **Jay F Stein**

jfstein@newmexicowaterlaw.com

• **Adan E. Trujillo**

adantrujillo@gmail.com

• **Ted J Trujillo**

tedjtrujillo@yahoo.com

• **John W. Utton**

jwu@ssslawfirm.com,py@ssslawfirm.com,djs@ssslawfirm.com

• **Timothy A Vollmann**

tim_vollmann@hotmail.com

• **Gabriel C Wade**

gabriel.wade@state.nm.us,ednewville@rgunwire.d.net,arianne.singer@state.nm.us,fred.kipnes@state.nm.us,vina.gallegos@state.nm.us

• **Fred Waltz**

fwaltz@kitcarson.net,cortega@kitcarson.net

/s/ John W. Utton

JOHN W. UTTON